

There is already a procedure for license upgrade. If someone is unwilling or unable to upgrade by passing the test(s), then that person is unqualified. Operating time in lower grades is no substitute for proving the competence to operate at a higher grade. If it were, then student pilots should be given commercial pilot's licenses even though they have not demonstrated the required competencies to the FAA. And 3rd Class Radiotelephone license holders should get a 1st Class license by virtue of their experience in switching a microphone on. This proposal would appear to be another attempt to lower the bar below the threshold of proving a requisite skill set. Ipso facto, RM-10620 is, in my opinion undeserving of consideration.